



**U.S. Department of Justice**

Criminal Division

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*Washington, D.C. 20530*

September 27, 2019

**TRANSMITTED VIA CM/ECF AND U.S. MAIL**

Hon. Gabriel Gorenstein  
United States Chief Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *In re: Enforcement of Philippine Forfeiture Judgment*, Misc. No. 19-412 (LAK) (GWG)

Dear Judge Gorenstein:

Pursuant to Section 2(A) of the Court's Individual Practices, Applicant United States of America ("the Government") hereby notifies the Court that the Government's forthcoming Opposition to the Duran Class' summary judgment motion (Dkts. 37-41) will also constitute a cross-motion for summary judgment. The Government will be cross-moving for summary judgment on the same statute-of-limitations issue that was raised in Duran's motion.

The Government has conferred with counsel for Duran. The parties agree that the default timelines of Local Rule 6.1 should govern the briefing schedule for the Government's cross-motion.

Respectfully Submitted,

/s/ Joshua L. Sohn

Joshua L. Sohn

Trial Attorney

Money Laundering and Asset Recovery Section

U.S. Department of Justice

*Attorney for Applicant United States of America*